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March 21, 2012

STANLEY P. DULL, TREASURER IMMIGRATION911, LLC P.O. BOX 10010 MANASSAS, VA 20108

Response Due Date 04/25/2012

IDENTIFICATION NUMBER: C00495259

REFERENCE: YEAR-END REPORT (08/01/2011 - 12/31/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 7 item(s):

- 1. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). (2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)) If a new treasurer has been appointed, please file an amended Statement of Organization or a letter (if not an electronic filer) to reflect this change.
- 2. There should not be a gap in the coverage dates of your report. You must file an amended Year-End report to include the activity from 7/1/11 to 7/31/11. (2 U.S.C. § 434(b))
- 3. The beginning cash balance of this report does not equal the ending balance of your Mid-Year report (1/1/11-6/30/11). Please correct this discrepancy and amend all subsequent reports(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))
- **4.** The totals listed on Line(s) 6(c), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect

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only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))

5. Schedule A of your report discloses one or more loans totaling \$132,101.91 from "Immigration911, LLC," which appears to be a corporation(s). Please be advised that a loan is defined as a contribution unless it is received by a State bank, federally chartered depository institution, or a depository institution whose deposits and accounts are insured by the Federal Deposit insurance Corporation of the National Credit Union Administration. 11CFR 114.1(a)(1)

2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. (11 CFR §110.1(g)(1) through (5))

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

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Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

- **6.** Schedule A of your report discloses receipt(s) from "Immigration911, LLC." However, you have also disclosed "Independence Realty, LLC." for this transaction(s). Please amend your report to include the missing information.
- 7. On Schedule B supporting Line 23 of the Detailed Summary Page, your committee discloses a disbursement for "Corey Stewart for Chairman" and lists itself (Immigration911, LLC) as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Sincerely,

Ashley Carter

Senior Campaign Finance Analyst

Reports Analysis Division